

1. all expert discovery shall be completed by February 28, 2025;
 - a. the parties may jointly determine intermediary expert deadlines without consent of the Court;
2. the parties shall submit a joint status letter on March 3, 2025;
3. the case management conference will occur on March 6, 2025.

The amended case management plan will issue separately. SO ORDERED.

Via ECF

MEMO ENDORSED

Honorable Dale E. Ho, U.S.D.J.
Thurgood Marshall Courthouse
40 Foley Square, Courtroom 905
New York, NY 10007



Dale E. Ho
United States District Judge
Dated: December 17, 2024
New York, New York

RE: *Christopher Rodriguez v. Equinox Holdings, Inc., et al.*, Case No. 1:24-cv-01238

Dear Judge Ho,

Plaintiff writes jointly with Defendants to submit a proposed amended Case Management Plan at this Court's request, in light of the simultaneous settlement negotiations between the Parties. *See ex. A*. The Parties propose the following alternative dates for the completion of Expert Discovery, Joint Status Letter, and Case Management Conference following the Close of Discovery:

| | Current Deadline | Proposed Deadline |
|--------------------------------|-------------------|-------------------|
| Completion of fact discovery | January 17, 2025 | |
| Parties' expert disclosures | January 17, 2025 | |
| Completion of Expert Discovery | January 31, 2025 | February 28, 2025 |
| Joint Status Letter | February 12, 2025 | March 12, 2025 |
| Case Management Conference | February 20, 2025 | March 20, 2025 |

We thank Your Honor for the Court's time and attention to this matter.

Respectfully submitted,



Olivia Davis

cc: All counsel of record